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June 27, 2017

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: Tina Braunstein v. Sahara Plaza, LLC, et al.
16-cv-8879 (VSB)

Dear Judge Broderick:

I represent the Plaintiff, Tina Michelle Braunstein, in this action with various causes of action alleging employment discrimination. On March 10, 2017, the two parties appeared before you and entered into a so-ordered Case Management Plan and Scheduling Order.

The order provided for the provision of interrogatories and document demands by March 31, 2017. My client has responded to the many document demands and interrogatories from Defendants and their supplemented requests. Further, my client's deposition was completed on May 18, 2017.

Plaintiff has not served what are anticipated to be minimal document demands at this time due to counsel's trial schedule and other commitments.

The purpose of this letter is to request a sixty (60) day extension to complete document discovery and noticed depositions of three of the Defendants' employees which can be conducted in a single day if they are available.

Under the present order, all depositions were to be completed by June 30, 2017, with all discovery to be completed by August 31, 2017. I believe the granting of the requested extension will not extend the time for any dispositive motions (September 15, 2017) or the conference scheduled for October 6, 2017.

No prior applications for an extension has been made by either party.

I have spoken with Defendants' counsel's secretary and he did not consent to this extension request and no reason was provided.

Therefore, I respectfully request an extension to complete all outstanding discovery until August 30, 2017.

Very truly yours,



E. Gordon Haesloop, Esq.

EGH/cm

cc: David I. Rosen, Esq.
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